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June 27, 2014

**VIA FAX - 212.805.6737**

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Laydon v. Mizuho Bank, Ltd., et al., No. 1:12-cv-03419-GBD (S.D.N.Y.)

Dear Judge Daniels:

I am counsel to Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A. ("Rabobank") in the above-captioned action (the "*Laydon* Litigation"), which is pending before the Court.

Patricia Astorga, one of your former law clerks, joined Milbank, Tweed, Hadley & McCloy LLP ("Milbank") on June 25, 2014 as an associate in the firm's New York office. I am writing pursuant to Rule 1.11 of the New York Rules of Professional Conduct, which (i) bars a former law clerk from representing a client in connection with a matter in which he or she participated personally and substantially while clerking, and (ii) describes notification and screening requirements that must be put in place to ensure that the former law clerk does not share information regarding the matter with others at the firm. This letter sets out Milbank's compliance with the requirements of Rule 1.11.

1. Milbank has taken the following steps to screen Ms. Astorga from the *Laydon* Litigation:

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- a. Our Conflicts Department and Risk Management Committee distributed a memorandum to all legal personnel who are working on the *Laydon* Litigation, instructing them that they are not to discuss this matter with Ms. Astorga or allow her access to documents concerning it.
- b. Our Conflicts Department and Risk Management Committee distributed a memorandum to Ms. Astorga instructing her that she is not to participate in any aspect of the *Laydon* Litigation, discuss it with any legal personnel working on it or review any documents relating to it.
- c. Our Conflicts Department and Records Department have been instructed that they are not to allow Ms. Astorga access to any files relating to the *Laydon* Litigation and have been instructed to construct electronic security to prevent Ms. Astorga from access to electronic documents related to the *Laydon* Litigation.

2. As Ms. Astorga is a salaried employee, she will not share in any fees attributable to our work on the *Laydon* Litigation.

If the Court requires any additional information concerning this matter, please let me know, and we will be happy to provide it.

Respectfully submitted,



Sean M. Murphy

SMM:cf

cc: Counsel of Record  
via email

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**FACSIMILE TRANSMISSION**

**DATE:** June 27, 2014

**To:**

NAME	FAX No.	PHONE No.
Hon. George D. Daniels, USDC: Southern District	212-805-6737	

**FROM:** Sean M. Murphy

**PHONE:** 212-530-5688

FILE NUMBER:	34777-02400		
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**Frye, Carol**

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